November 21, 2010

Lynda Deschambault
EPA Site Manager
75 Hawthorne St.
San Francisco, CA 94105

Subject: Comments to Final Omega Operable Unit-2 Remedial Investigations and Feasibility Reports dated August 2010

Re: Omega Chemical Corporation (EPA # CAD042245001)

Dear Ms. Deschambault:

Thank you for allowing the public the opportunity to provide comment on the RI/FS for the project referenced above. I appreciate the work done so far by the USEPA to determine the extent of the contamination from the Omega site and to evaluate potential corrective actions. The following comments are being provided to you to ensure that the concerns of the community are entered into the official record and to assist you with the difficult work you face in determining the appropriate course of action to protect human health and safety.

GROUNDWATER INVESTIGATION DATA GAPS

Having reviewed both the Final Remedial Investigation Report and the Final Feasibility Study Report, it is my opinion that additional site investigation needs to be conducted around the Pioneer and Dace wells to determine the extent and degree of the contamination moving toward these wells and of any contamination that may be moving past these wells.

Both of the reports include site maps that depict the extent of various contaminants. The western and southern portions of the plumes, however, have relatively few control points. Within the area of by Florence Avenue, Pioneer Boulevard, Norwalk Boulevard and Interstate 5, about one half square mile, there are exactly two EPA monitoring wells. The centerline of the PCE plume depicted on figure 1-4 of the FS Report is shown to be essentially parallel to Norwalk Boulevard, for half a mile south of Florence Avenue. The southern edge of this plume, and of the 100ug/L contour are well documented by the numerous CENCO monitoring points. No monitoring points exist north of Norwalk Boulevard. A Series of five Hydropunch sample points were driven along Lakeland Road near its intersection with Pioneer Boulevard. At most of these locations water samples were collected at two depth intervals, 87’-90’ bgs and 97’-100’ bgs. These data points were reportedly used to select the location for well MW-28. MW-28 is screened from 85’ to 100’ bgs. It appears that Figure 1-4 uses the Hydropunch data from HP28-2 and HP28-3 to place the 5ug/L contour line for the mile distance between Lakeland Road and Telegraph Road. Another

cluster of thirteen Hydropunch samples were collected between Beaty Street and the I-5, just west of Norwalk Boulevard. Groundwater samples were collected between about 97' and 116'.

The distance between the Beaty Street sample (HP29-7) and the Lakeland Road samples (HP28-1) is about 0.5 mile. The public supply wells on Pioneer are about 0.35 mile directly west of this gap. Although groundwater elevation contours shown on figure 1-4 show water flow to the south or southeast in this area, again, there is no monitoring point south of Lakeland Road for almost one mile. The groundwater elevation contours seem to be controlled by data points east of Norwalk Boulevard and may not be accurate between Norwalk and Pioneer Boulevards.

Figure 1-4 seems to acknowledge this data gap by showing an inferred contour interval of potential contamination below 200' bgs extending from MW-28 to the Pioneer supply wells. Another extension is also shown at the southern end of the plume toward the Dace supply well. The significance of data gap in the shallow zone around these public supply wells may be argued, however, the data gap in below 150' is undeniably significant. Additional shallow and deep wells should be installed north and east of the Pioneer wells and north of the Dace well, especially given the documented detections of various contaminants from these wells since the 1980s. Further justification for the installation and monitoring of deeper wells around the Pioneer and Dace wells is that their screened intervals are between 200' and 400' bgs and are pumped at between 300 and 500 gallons per minute which can produce significant downward vertical gradients and which could pull dissolved-phase contaminants below the 100' bgs depth of most the monitoring wells and hydropunch samples.

Additional assessment should also be pursued south of the Pioneer and Dace wells to determine if contaminants are by-passing the supply wells, whether by incomplete capture during pumping or due to periodic shut down events of the supply wells. If contamination is found to be by-passing the supply wells, further assessment and potential expansion of the extraction well network should be considered. There have been cases, in similar hydrogeologic settings in southern California where groundwater contaminants were drawn toward public supply wells, but continued to move past the wells. In one instance, this seemed to have occurred during periods when the wells were temporarily shut down. In another case, shallow contaminants at the water table were drawn downward tens of feet as it approached a supply well. This contamination did not reach the well intake, more than 100' deeper, but detectable contamination did continue to migrate laterally past the well location.

## PREFERRED REMEDIAL ALTERNATIVE

In general, based on the modeling conducted and reported in the FS Report, it appears that Alternative 5 is the most appropriate alternative for this project. Plume-wide extraction provides for the most complete and timely removal of the contaminants in the southern half of the plume. This will provide the most protection to the Pioneer and Dace public supply wells throughout the duration of this project. These wells provide drinking water to a significant population and losing the use of these wells would place a significant burden on the residents and operators of the water company service area.

Discharging the water to the spreading basin provides another level of protection to the population serviced by the City of Santa Fe Springs. A failure of the treatment facilities that is not detected immediately could result in the contamination of up to 4 million gallons of water in the City's reservoir. If this occurred, additional blending or treatment of the water in the reservoir would be required. In the worst case, contaminated water exceeding MCLs could be distributed to the community via the public water supply. Discharge to the spreading basin provides a more reliable buffer in case of a short-term interruption of the treatment process.

Thank you again for considering these comments.

Sincerely,

Anthony F. Martinez, PG, CHG, CEG
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